201114

# SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 919-967-1450

200 WEST FRANKLIN STREET, SUITE 330 CHAPEL HILL, NC 27516-2559

Facsimile 919-929-9421

January 5, 2010

Mr. Charles L.A. Terreni

Chief Clerk of the Commission

SC Public Service Commission C. PUD

P.O. Drawer 11649

Columbia, SC 29211

VIA U.S. MAIL

S. MAIL

S. MAIL

RE: South Carolina Electric & Gas Company's Request for Approval of Demand Side

Management Plan Including a Demand Side Management Rate Rider and

Portfolio of Energy Efficiency Programs

Docket No. 2009-261-E

Dear Mr. Terreni:

Please find enclosed for filing in the above-referenced docket the original and two copies of a Motion for Admission Pro Hac Vice and Verified Application of Gudrun Elise Thompson. Please date-stamp the extra copy and return it to me in the stamped, self-addressed envelope enclosed for your convenience. By copy of this letter I am serving a copy of the same on all parties of record. If you have questions, please do not hesitate to contact me.

Sincerely,

Kate Double

Administrative Legal Assistant

**Enclosures** 

Cc (w/encl.): Parties of Record

#### STATE OF SOUTH CAROLINA

#### BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2009-261-E

In the Matter of:	)		
	)		
South Carolina Electric & Gas Company's	)		
Request for Approval of Demand Side Management Plan Including a Demand		MOTION FOR ADMISSION  PRO HAC VICE	
			Side Management Rate Rider and Portfolio
of Energy Efficiency Programs	)		

Petitioners the South Carolina Coastal Conservation League and the Southern Environmental Law Center ("Petitioners") hereby move the South Carolina Public Service Commission ("Commission") to permit Gudrun Thompson to practice *pro hac vice* before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Thompson, with the consent of counsel of record, is simultaneously filing with the South Carolina Supreme Court a copy of the Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, Petitioners respectfully request that this motion be granted.

This 5<sup>th</sup> day of January, 2010.

J. Blanding Holman IV

Southern Environmental Law Center

43 Broad Street, Suite 300

Charleston, SC 29401

Telephone: (843) 720-5270

Fax: (843) 720-5240

#### CERTIFICATE OF SERVICE

I hereby certify that the following persons have been served with the Motion for Admission Pro Hac Vice and Verified Application for Admission Pro Hac Vice of Gudrun Elise Thompson via electronic mail:

Lee E. Dixon Pope Zeigler, LLC Post Office Box 11509 Columbia, SC, 29211

Joey R. Floyd Bruner, Powell, Robbins, Wall & Mullins, LLC Post Office Box 61110 Columbia, SC, 29260

Shannon B. Hudson Office of Regulatory Staff 1401 Main Street Suite 900 Columbia, SC, 29201

Catherine D. Taylor South Carolina Electric & Gas Company 1426 Main Street, M/C 130 Columbia, SC, 29201

Robert Guild 314 Pall Mall Columbia, SC 29211

Mitchell Willoughby Willoughby & Hoefer, P.A. Post Office Box 8416 Columbia, SC 28211

This day of 5<sup>th</sup> day of January, 2009

E. Wade Mullins, III Bruner Powell Robbins Wall & Mullins, LLC Post Office Box 61110 Columbia, SC, 29260

Frank Knapp, Jr. 1717 Gervais Street Columbia, SC, 29201

Belton T. Zeigler Pope Zeigler, LLC Post Office Box 11509 Columbia, SC, 29211

K. Chad Burgess South Carolina Electric & Gas Company 1426 Main Street, MC 130 Columbia, SC, 29201

Damon E. Xenopoulos Brickfield, Burchette, Ritts & Sone, PC 1025 Thomas Jefferson Street, NW 8<sup>th</sup> Floor – West Tower Washington, DC 20007

Kate Double

Administrative Legal Assistant

# VERIFIED APPLICATION FOR ADMISSION PRO HAC VICE IN THE STATE OF SOUTH CAROLINA

South Carolina Electric & Gas Compa Request for Approval of Demand Side Management Plan Including a Deman Side Management Rate Rider and Por of Energy Efficiency Programs	<u>e</u> n <u>d</u>	O. 2009-261-E	Public Service Commission of South Carolina		
Plaintiff	C	ase No.	Court		
VS.	-	2.2.			
Defendant	Mailing	Address of Court:	Public Service Commission of South Carolina, 101 Executive Center Dr., Suite 100 Columbia, SC 29210		
Comes now <u>Gudrun Elise Thompson</u> , applicant herein, and respectfully represents the following:					
1. Applicant resides at: 5423 Bobcat Road Street Address					
Chapel Hill Orang	<u>e</u>	North Carolina	<u>27516</u>		
City County (919 968-4643 Telephone	у	State	Zip Code		
2. Applicant is an attorn Environmental Law Center, with office 200 W. Franklin St., Suite 330 Street Address		law firm of (or prac	tices law under the name of) Southern		
Chapel Hill Orang	e	North Carolina	<u>27516</u>		
City Count		State	Zip Code		
919-967-1450	•	919-929-9421			
Telephone		Fax Number			
3. Applicant has been retained personally or as a member of the above named law firm by the South Carolina Coastal Conservation League and the Southern Environmental Law Center to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.					
4. Since <u>August</u> of <u>2002</u> , applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of <u>North Carolina</u> where applicant regularly practices law. Attached is a certificate of good standing.					
5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)					
Court:			Date Admitted:		
North Carolina state courts	1	August 27, 2002	Date 1 Administra		
U.S. District Court for the Eastern Di	st. of North Carolina	September 5, 2002			
• .					

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

## not applicable

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

#### not applicable

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

## not applicable

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

#### not applicable

9. Local counsel of record associated with applicant in this case is <u>J. Blanding Holman IV</u>, of the Southern Environmental Law Center law firm, which has offices at:

43 Broad Street, Suite 300

Street Address

Charleston County Charleston City South Carolina

29401-3042 Zip Code

State

843-720-5270

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

#### not applicable

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

Case Name: In the Matter of: Application of Duke Energy Carolinas, LLC for Approval of Energy Efficiency Plan Including an Energy Efficiency Rider and Portfolio of Energy Efficiency Programs (S.C. Public Service Commission Docket No. 2007-358-E).

Status: Docket closed

Date of Application: January 25, 2008

Local Counsel of Record: J. Blanding Holman IV

**Application Granted** 

Case Name: Environmental Defense Fund, et al. v. S.C. Department of Health and Environmental Control (No. 09-ALJ-07-0166-CC)

Status: Case stayed.

Date of Application: May 4, 2009

Legal Counsel of Record: J. Blanding Holman IV

**Application Granted** 

Case Name: Application of Duke Energy Carolinas LLC for Authority to Adjust and Increase Its Electric Rates and Charges (S.C. Public Service Commission Docket No. 2009-226-E)

Status:

Date of Application: November 6, 2009

**Application Granted** 

Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 5th day of January, 2010.

APPLICANT

#### VERIFICATION

# STATE OF NORTH CAROLINA)

#### COUNTY OF ORANGE)

I, <u>Gudrun Elise Thompson</u>, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

APPLICAN/AFIAN

Subscribed and sworn to before me this 6th day of January, 2010.

Lou Ann Pholps, Notary Public . Notary Public for the State of Horth Carolina

My Commission Expires: October 25, 2011

LOU ANN PHELPS Notary Public, North Carolina Durham County

My Commission Expires
October 25, 2011

# LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 6th day of January, 2010.

LOCAL COUNSEL OF RECORD

# CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this \_\_\_\_\_ day of January, 2010.

APPLICANT/ATFIANT

# Supreme Court OF THE STATE OF NORTH CAROLINA



I, Christie Speir Cameron, Clerk of the Supreme Court of North Carolina, do hereby certify that on August 27, 2002, a license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

# GUDRUN ELISE THOMPSON

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at the office in Raleigh, this

December 30, 2009

histic 3. Cameron
Christie Speir Cameron

Christie Speir Cameron
Clerk of the Supreme Court
of the State of North Carolina